



**Service of Process
Transmittal**

01/23/2019

CT Log Number 534783311

TO: Kim Lundy Service of Process, Legal Support Supervisor
Walmart Inc.
702 SW 8th St, MS#0215
Bentonville, AR 72716-6209

RE: Process Served in Minnesota

FOR: Wal-Mart Transportation, LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Ngwesse Pamela, Pltf. vs. Wal-Mart Transportation, Inc. and John Robert Jackson, Dfts.

DOCUMENT(S) SERVED: Summons, Complaint, Attachment(s)

COURT/AGENCY: Washington County - 10th Judicial District Court, WA
Case # NONE

NATURE OF ACTION: Personal Injury - Vehicle Collision - 07/17/2015

ON WHOM PROCESS WAS SERVED: CT Corporation System, Inc, Saint Paul, MN

DATE AND HOUR OF SERVICE: By Process Server on 01/23/2019 at 13:34

JURISDICTION SERVED : Minnesota

APPEARANCE OR ANSWER DUE: Within 20 days of receipt (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Richard J. Schroetter
Schroeder & Mandel, P.A.
219 Little Canada Road E.
Suite 200
St. Paul, MN 55117
651-426-8740

ACTION ITEMS: CT has retained the current log, Retain Date: 01/24/2019, Expected Purge Date: 01/29/2019

Image SOP

Email Notification, Kim Lundy Service of Process ctlawsuits@walmartlegal.com

SIGNED: CT Corporation System, Inc
ADDRESS: 1010 Dale St. N.
Saint Paul, MN 55117-5603
TELEPHONE: 312-345-4336

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF WASHINGTON

TENTH JUDICIAL DISTRICT

Pamela Ngwesse,

Case Type: Personal Injury

Court File No.:

Judge:

Plaintiff,

SUMMONS

vs.

Wal-Mart Transportation, Inc., and
John Robert Jackson,

Defendants.

THIS SUMMONS IS DIRECTED TO DEFENDANT WAL-MART TRANSPORTATION, INC., 702 SW 8TH STREET, BENTONVILLE, ARKANSAS, 72716; AND DEFENDANT JOHN ROBERT JACKSON, 8200 BURNELL DRIVE, EAU CLAIRE, WISCONSIN 54703:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.
2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a written response called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

SCHROEDER & MANDEL, PA
219 Little Canada Road E, Suite 200
St. Paul, Minnesota 55117
3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.
4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond.

A default judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.
6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

SCHROEDER & MANDEL, PA

Date:

1/11/19

By:



Richard J. Schroeder, #231629
219 Little Canada Road E, Suite 200
St. Paul, Minnesota 55117
Telephone: (651) 426-8740
Facsimile: 877-822-3312
Email: rick@schroederandmandel.com

-and-

MCEWEN & KESTNER, PLLC

Date:

12/12/18

By:



Peter J. Kestner, #0311662
5854 Blackshire Path
Inver Grove Heights, Minnesota 55076
Telephone: (651) 209-7575
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ATTORNEYS FOR PLAINTIFF
PAMELA NGWESSE

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF WASHINGTON

TENTH JUDICIAL DISTRICT

Pamela Ngwesse,

Case Type: Personal Injury

Court File No.:

Judge:

Plaintiff,

COMPLAINT

vs.

Wal-Mart Transportation, Inc.,
and John Robert Jackson,

Defendants.

Plaintiff, Pamela Ngwesse, for her Complaint against the above-named Defendants, states and alleges:

I.

The Plaintiff, Pamela Ngwesse, at all times herein material resides at 6975 29th Street North, City of Oakdale, State of Minnesota, 55128.

II.

That Defendant, Wal-Mart Transportation, LLC (hereinafter "Wal-Mart Transportation"), is an Arkansas corporation with its principal place of business at 702 SW 8th Street, City of Bentonville, County of Benton, State of Arkansas, 72716, however, Defendant does business throughout the State of Minnesota, including Washington County.

III.

That Defendant, John Robert Jackson, at all times material resides at 8200 Burnell Drive, City of Eau Claire, State of Wisconsin.

IV.

On July 17, 2015, Plaintiff Pamela Ngwesse was driving her 2007 Infiniti G35 vehicle, bearing Minnesota license plate number, 286-HVV. Plaintiff was traveling northbound on I-494 at Valley Creek Road in the right lane, in the City of Woodbury, County of Washington, when she began slowing for traffic, and ultimately stopped.

VI.

At the aforementioned date and place, Defendant John Robert Jackson, while in the course and scope of his employment with Defendant Wal-Mart Transportation, Inc., was operating a 2011 semi truck, bearing Oklahoma license plate number, 2PG209, which upon information and belief was owned and maintained by Defendant Wal-Mart Transportation, Inc. Defendant John Robert Jackson was traveling behind Plaintiff on 494. Traffic was slowing, Plaintiff was slowing when, suddenly and without warning, Defendant John Robert Jackson drove the above-referenced semi-tractor trailer into the rear of Plaintiff's vehicle. See Exh. A, Traffic Accident Report.

VII.

At said time and place, Defendant John Robert Jackson illegally, negligently, carelessly and unlawfully caused the semi-truck and trailer he was operating, which was owned and maintained by Defendant Wal-Mart Transportation, Inc., to collide with the vehicle in which the Plaintiff was operating. As a result, Defendant John Robert Jackson violated Minnesota law in one or more of the following ways:

1. By driving inattentively;
2. By driving while distracted;
3. By failing to keep a proper lookout;
4. By driving too fast for conditions;
5. By failing to keep his vehicle under control in his lane of travel;
6. By operating a vehicle in a careless manner as defined by Minn. Stat. §169.13, Subd. 2;
7. By failing to abide by Defendant Wal-Mart Transportation's own safety rules & procedures; and

8. In many other ways which will be proven at the time of trial.

VIII.

As a direct and proximate result of the illegal, negligent, careless and unlawful conduct of Defendant John Robert Jackson, Plaintiff Pamela Ngwesse sustained in excess of \$34,241.95 in reasonable and necessary medical treatment. Plaintiff continues to treat for her injuries; and according to some of Plaintiff's treating physicians some of the Plaintiff's injuries are permanent in nature. Plaintiff has incurred \$9,279.36 in lost earnings; and has in excess of 60 days disability, thus satisfying at least one of the tort thresholds as set forth in Minn. Stat. §65B, Subd. 3.

IX.

As a direct and proximate result of the aforesaid illegal, negligent, careless and unlawful conduct of Defendant John Robert Jackson, Plaintiff Pamela Ngwesse has incurred in the past and will in the future incur expenses for reasonable and necessary medical care and treatment; has in the past and will in the future incur loss of earnings; and as a result, she has in the past and will in the future suffer physical pain and mental harm; and also she has ongoing past and will have future economic losses all to her detriment.

X.

At said time and place, the Defendant John Robert Jackson was in the course and scope of his employment with Defendant Wal-Mart Transportation, Inc. As such, pursuant to the doctrine of respondeat superior, Defendant Wal-Mart Transportation, Inc. is vicariously liable for the acts and conduct of its employee, Defendant John Robert Jackson. An employer is liable for the negligent acts of its employee committed in the course and scope of employment when: (1) the conduct was to some degree in furtherance of the employer's interests; (2) the employee was authorized to perform the type of conduct; (3) the conduct occurred substantially within the employer's authorized time and space restrictions; and (4) the employer should reasonably have foreseen the

conduct. Snilsberg v. Lake Washington Club, 614 N.W.2d 738, 745 (Minn. Ct. App. 2000).

Defendant John Robert Jackson's conduct clearly satisfies all four of the above factors.

XI.

In addition to the negligent, careless, illegal and unlawful conduct of Defendant John Robert Jackson, Defendant Wal-Mart Transportation, Inc., upon information and belief, violated Minnesota law, or is causally negligent in one or more of the following ways:

1. By failing to properly train and/or supervise its employee drivers;
2. By failing to properly maintain and service its commercial vehicles in order to assure the public that they are safe and road-worthy;
3. By allowing its employees to operate its commercial vehicles with faulty equipment;
4. By failing to properly inspect its commercial vehicle before allowing its employee drivers to operate said commercial vehicle on Minnesota's roads and highways; and
5. In many other ways to be proven following discovery and at the time of trial.

XII.

As a further and direct and proximate result of the aforesaid negligent, carelessness and illegal conduct of Defendant Wal-Mart Transportation, as outlined in Paragraph XI above, and others incorporated herein, Plaintiff has incurred and will in the future incur expenses for necessary medical and hospital care and treatment; past and present wage loss, lost earnings, loss of earning capacity, and as a result, she has in the past and will in the future suffer physical and mental pain, and other harms and losses.

XIII.

In addition, at said time and place, the vehicle being driven by Defendant John Robert Jackson was owned by Defendant Wal-Mart Transportation, Inc. As a result, pursuant to Minn. Stat. §169.09, Defendant Wal-Mart Transportation, Inc. is also vicariously responsible for all of


Plaintiff's injuries and damages caused by the operation of said vehicle operated by Defendant John Robert Jackson.

WHEREFORE, Plaintiff Pamela Ngwesse demands judgment, jointly and severally, against the Defendants Wal-Mart Transportation, Inc. and John Robert Jackson, in an amount in excess of Fifty Thousand and no/100 (\$50,000.00) Dollars together, along with costs, pre-judgment and post judgment interest and disbursements as allowed by Minnesota law.

PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY.

SCHROEDER & MANDEL, PA


Date: 1/11/19

By: 
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St. Paul, Minnesota 55117
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Facsimile: 877-822-3312
Email: rick@schroederandmandel.com

-and-

MCEWEN & KESTNER, PLLC

Date: 12/12/18

By: 
Peter J. Kestner, #0311662
5850 Blackshire Path
Inver Grove Heights, Minnesota 55076
Telephone: (651) 209-7575
Facsimile: (651) 223-5790
Email: pete@crawfordkestner.com

ATTORNEYS FOR PLAINTIFF
PAMELA NGWESSE



- 1- NO CLEAR CONTRIBUTING FACTOR
2- FAILURE TO YIELD RIGHT OF WAY
3- ILLEGAL/UNSAFE SPEED
4- FOLLOWING TOO CLOSELY
5- DISREGARDED TRAFFIC CONTROL DEVICE
6- DRIVING LEFT OF ROADWAY CENTER
NOT PASSING
7- IMPROPER PASSING/OVERTAKING
8- IMPROPER/UNSAFE LANE USE

FACTOR 1 & FACTOR 2 - APPARENT CONTRIBUTING FACTORS (UP TO TWO PER DRIVER)

(NOTE: PLEASE INDICATE PRIMARY FACTOR IN THE BOX MARKED FACTOR 1)

- 9- IMPROPER PARKING/START/STOP
10- IMPROPER TURN
11- UNSAFE BACKING
12- IMPROPER/NO SIGNAL
13- OVER-CORRECTING
14- IMPEDING TRAFFIC
15- DRIVER INATTENTION/DISTRACTION

- 16- DRIVER INEXPERIENCE
17- NON-MOTORIST VIOLATION / ERROR
18- CHEMICAL IMPAIRMENT
19- FAILURE TO USE LIGHTS
20- DRIVER ON CAR PHONE/CR/2WAY RADIO
21- OTHER HUMAN CONTRIBUTING FACTOR*
31- VISION OBSCURED-WINDSHIELD GLASS

- 32- VISION OBSCURED - SUN/HEADLIGHTS
33- OTHER VISION FACTOR
41- DEFECTIVE BRAKES
42- DEFECTIVE TIRE OR TIRE FAILURE
43- DEFECTIVE LIGHTS
44- INADEQUATE WINDSHIELD GLASS
45- OVERSIZE/OVERWEIGHT VEHICLE

- 46- SKIDDING
50- OTHER VEHICLE DEFECT FACTOR*
61- WEATHER
90- OTHER CONTRIBUTING FACTOR*
99- UNKNOWN

MANUEVER - PRE-CRASH**BY VEHICLE**

- 1- GOING STRAIGHT AHEAD
FOLLOWING ROADWAY
2- WIDING WAY INTO
OPPOSING TRAFFIC
3- RIGHT TURN ON RED
4- LEFT TURN ON RED
5- MAKING RIGHT TURN

6- MAKING LEFT TURN

- 7- MAKING U-TURN
8- STARTING FROM PARKED POSITION
9- STARTING IN TRAFFIC
10- SLOWING IN TRAFFIC
11- STOPPED IN TRAFFIC
12- ENTERING PARKED POSITION
13- AVOID VEHICLE/OBJECT IN ROAD
14- CHANGING LANES

15- OVERTAKING/PASSING

- 16- MERGING
17- BACKING
18- STALLED ON ROADWAY

PARKED VEHICLES

- 21- PARKED LEGALLY
22- PARKED ILLEGALLY
23- VEHICLE STOPPED OFF ROADWAY

BY PEDESTRIAN

- 31- CROSSING WITH SIGNAL
32- CROSSING AGAINST SIGNAL
33- DARTING INTO TRAFFIC
34- OTHER IMPROPER CROSSING
35- CROSSING IN A MARKED
CROSSWALK
36- CROSSING (NO SIGNAL
OR CROSSWALK)
37- FAIL TO YIELD R/W TO TRAFFIC

38- INATTENTION/DISTRACTION

- 39- WALKING/RUNNING IN ROAD
WITH TRAFFIC
40- WALKING/RUNNING IN ROAD
AGAINST TRAFFIC
41- STANDING/LYING IN ROAD
42- EMERGING FROM BEHIND
PARKED VEHICLE
43- CHILD GETTING ON/OFF SCHOOL BUS
44- PERSON GETTING ON/OFF VEHICLE

45- PUSHING/WORKING ON VEHICLE

- 46- WORKING IN ROADWAY
47- PLAYING IN ROADWAY
48- NOT IN ROADWAY

BY BICYCLIST

- 51- RIDING WITH TRAFFIC
52- RIDING AGAINST TRAFFIC
53- MAKING RIGHT TURN
54- MAKING LEFT TURN
55- MAKING U-TURN
56- RIDING ACROSS ROAD
57- SLOWING/STOPPING/STARTING
90- OTHER*
99- UNKNOWN

PHYSICAL - APPARENT**PHYSICAL CONDITION**

- 1- NORMAL (NO DRUGS/ALCOHOL)

2- UNDER THE INFLUENCE

- 3- HAD BEEN DRINKING
4- COMMERCIAL DRIVER OVER .04 BAC

5- HAD BEEN TAKING DRUGS

- 6- AGGRESSIVE
7- FATIGUED/ASLEEP

8- PHYSICALLY CHALLENGED

- 9- ILL

90- OTHER*

- 98- NOT APPLICABLE
99- UNKNOWN

RECOMMEND - RECOMMENDATIONS FOR DRIVER

- 1- NONE
2- PHYSICAL EXAM

- 3- DRIVER EXAM
4- BOTH

VEH TYPE - VEHICLE TYPE

- 1- PASSENGER CAR
2- PICKUP
3- SPORT UTILITY VEHICLE

4- VAN OR MINI-VAN

- 5- MOTORHOME/CAMPER/RV
6- LIMOUSINE
7- BUS (7-15 SEATS PLUS DRIVER)

8- BUS (16+ SEATS PLUS DRIVER)

- 9- SCHOOL BUS
10- ATV
11- MOTORCYCLE

12- MOTOCYCLOTE / MOTORBIKE

- 13- MOPED/MOTORIZED CYCLE
14- FARM EQUIPMENT
31- 2 AXLE, 6 TIRE SINGLE UNIT TRUCK

32- 3 OR MORE AXLE SINGLE UNIT TRUCK

- 33- SINGLE UNIT TRUCK W/TRAILER
34- TRUCK TRACTOR W/NO TRAILER
35- TRUCK TRACTOR W/SEMI-TRAILER

36- TRUCK TRACTOR W/OODUBLE TRAILERS

- 37- TRUCK TRACTOR W/TRIPLE TRAILERS
38- HEAVY TRACTOR OF UNKNOWN TYPE
51- PEDESTRIAN

52- SKATER

- 53- BICYCLIST
54- OTHER NON-MOTORIST
90- OTHER*
99- UNKNOWN

VEH USE - SPECIAL VEHICLE USE

- 98- NOT APPLICABLE
1- NORMAL

2- TAXICAB

- 3- SCHOOL BUS
4- BUS (OTHER THAN SCHOOL)
5- MILITARY VEHICLE

6- HIT & RUN VEHICLE

- 7- POLICE DEPT VEHICLE -
LIGHTS/SIRENS NOT
OPERATING

8- POLICE DEPT VEHICLE -

- LIGHTS/SIRENS OPERATING
9- FIRE DEPT VEHICLE -
LIGHTS/SIRENS NOT OPERATING

10- FIRE DEPT VEH - LIGHTS/SIREN OPERATING

- 11- AMBULANCE - LIGHTS/SIREN NOT OPERATING
12- AMBULANCE - LIGHTS/SIREN OPERATING
13- SNOWPLOW - WORKING

14- SNOWPLOW - IN TRANSIT

- 15- OTHER MAINT VEH - WORKING
16- OTHER MAINT VEH - IN TRANSPORT
17- OTHER PUBLICLY OWNED VEH*

90- OTHER VEHICLE USE*

- 98- NOT APPLICABLE
99- UNKNOWN VEHICLE USE

DIN LOC - PRINCIPAL DAMAGE AREA(S) OF VEHICLE

- 1- FRONT
2- RIGHT FRONT

- 3- RIGHT CENTER
4- RIGHT REAR

- 5- REAR
6- LEFT REAR

- 7- LEFT CENTER
8- LEFT FRONT

- 9- TOP
10- BOTTOM-UNDERCARRIAGE

- 11- MULTIPLE AREAS
90- OTHER*

- 98- NOT APPLICABLE
99- UNKNOWN

DMG SEV - DAMAGE SEVERITY

- 1- NONE
2- LIGHT
3- MODERATE
4- SEVERE

- 5- TOTAL
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

CARGO BODY TYPE -

- 1- VAN/ENCLOSED BOX
2- DRY BULK CARGO TANK

- 3- LIQUID BULK
4- GAS BULK CARGO TANK

- 5- FLATBED OR PLATFORM
6- DUMP

- 7- CONCRETE MIXER
8- AUTO TRANSPORTER

- 9- GARBAGE/REFUSE
10- COMBINATION

- 11- SPECIAL PERMIT LOAD
12- GRAIN/CHIPS/GRAVEL

- 13- POLE
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

IF ACCIDENT INVOLVED A COMMERCIAL MOTOR VEHICLE, SCHOOL BUS, OR HEAD START BUS,
REMEMBER TO NOTIFY THE STATE PATROL (required under MS 169.783 and 169.4511).

ACC TYP - ACCIDENT TYPE BY 1ST HARMFUL EVENT**COLLISION WITH**

- 1- MOTOR VEHICLE IN TRANSPORT
2- PARKED MOTOR VEHICLE
3- ROADWAY EQUIPMENT - SNOWPLOW
4- ROADWAY EQUIPMENT - OTHER
5- TRAIN
6- PEDALCYCLE
7- PEDESTRIAN
8- DEER
9- OTHER ANIMAL
10- UNDERBRIDGE - REAR
11- UNDERBRIDGE - SIDE
12- COLLISION WITH OTHER
TYPE OF NON-FIXED OBJECT
13- OTHER COLLISION TYPE*
14- UNKNOWN COLLISION TYPE

COLLISION WITH FIXED OBJECT

- 21- CONSTRUCTION EQUIPMENT
22- TRAFFIC SIGNAL
23- RR CROSSING DEVICE
24- LIGHT POLE
25- UTILITY POLE
26- SIGN STRUCTURE
27- MAILBOXES
28- OTHER POLES
29- HYDRANT
30- TREE/SHRUBBERY
31- BRIDGE PIERS
32- MEDIUM SAFETY BARRIER
33- CRASH CUSHION
34- GUARDRAIL
35- FENCE (NON-MEDIAN BARRIER)
36- CULVERT/HEADWALL
37- EMBANKMENT/DITCH/CURB
38- BUILDING/WALL
39- ROCK OUTCROPS
40- PARKING METER
41- OTHER FIXED OBJECT*
42- UNKNOWN FIXED OBJECT

NON-COLLISION

- 51- OVERTURN/ROLLOVER
52- SUBMERSION
53- FIRE/EXPLOSION
54- JACKKNIFE
55- LOSS/SPILLAGE NON-HAZ MAT
56- LOSS/SPILLAGE HAZ MAT
64- NON-COLLISION OF OTHER TYPE
65- NON-COLLISION OF UNKNOWN TYPE
90- OTHER ACCIDENT TYPE*
99- UNKNOWN ACCIDENT TYPE

DEVICE - TRAFFIC CONTROL DEVICE

- 1- TRAFFIC SIGNAL
2- OVERHEAD FLASHERS
3- STOP SIGN - ALL APPROACHES
4- STOP SIGN - NOT ALL APPROACHES
5- YIELD SIGN
6- OFFICER/FLAG PERSON/ SCHOOL PATROL
7- SCHOOL BUS STOP ARM
8- SCHOOL ZONE SIGN
9- NO PASSING ZONE
10- RR CROSSING GATE
11- RR CROSSING- FLASHING LIGHTS
12- RR CROSSING- STOP SIGN
13- RR OVERHEAD FLASHERS
14- RR OVERHEAD FLASHERS/GATE
15- RR CROSSBUCK
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

SCHOOL BUS INVOLVED

- 1- YES, INVOLVED DIRECTLY
2- YES, INVOLVED INDIRECTLY
3- NO
99- UNKNOWN

LOCATH - LOCATION OF FIRST HARMFUL EVENT (SEE EXAMPLE OF TRAFFIC WAY)

- 1- ON ROADWAY
2- ON SHOULDER
3- ON MEDIAN
4- ON ROADSIDE
5- ON SEPARATOR
6- PARKING LOT
7- PRIVATE PROPERTY
8- OUTSIDE OF TRAFFICWAY
90- OTHER*
99- UNKNOWN

TYPE OF WZ - WORK ZONE

- 1- LANE CLOSURE
2- LANE SHIFT/CROSSOVER
3- WORK ON SHOULDER/MEDIAN
4- INTERMITTENT
5- MOVING WORK ZONE
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

LOCATION OF CRASH RELATIVE TO THE WORK ZONE

- 1- BEFORE 1ST WARNING SIGN
2- ADVANCE WARNING AREA
3- TRANSITION AREA
4- ACTIVITY AREA
5- TERMINATION AREA
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

RD DESIGN - ROAD DESIGN

- 1- FREEWAY - MAIN LINE
2- FREEWAY - RAMP
3- OTHER DIVIDED HIGHWAY
4- ONE-WAY STREET
5- 4-6 LANES UNDIVIDED
(2-3 LANES EACH WAY)
6- 3 LANES UNDIVIDED
7- 5 LANES UNDIVIDED
(CENTER LEFT TURN LANE)
8- 2 LANES (1 LANE EACH WAY)
9- ALLEY/OVERWAY
10- ROAD ON PRIVATE PROPERTY
90- OTHER*
99- UNKNOWN

RD SURF - ROAD SURFACE CONDITIONS

- 1- DRY
2- WET
3- SNOW
4- SLUSH
5- ICE PACKED SNOW
6- WATER (STANDING/MOVING)
7- MUDDY
8- DEBRIS
9- OILY
90- OTHER*
99- UNKNOWN

RD CHAR - ROADWAY CHARACTER

- 1- STRAIGHT & LEVEL
2- STRAIGHT & GRADE
3- STRAIGHT AT HILLCREST
4- STRAIGHT AT SAG
5- CURVE & LEVEL
6- CURVE & GRADE
7- CURVE AT HILLCREST
8- CURVE AT SAG
90- OTHER*
99- UNKNOWN

WORKING - WAS SIGNAL WORKING PROPERLY?

- 1- SIGNAL WORKING PROPERLY
2- SIGNAL NOT WORKING PROPERLY
3- SIGNAL WORKING IN MODIFIED FASHION
4- SIGNAL OBSCURED/ DAMAGED
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

INT REL - RELATIONSHIP TO INTERSECTION/JUNCTION

- 1- NOT AT INTERSECTION/JUNC
2- T INTERSECTION
3- Y INTERSECTION
4- 4 LEGGED INTERSECTION
5- 5 OR MORE POINT INTERSECTION
6- TRAFFIC CIRCLE OR ROUND ABOUT
7- INTERSECTION RELATED
8- ALLEY OR DRIVEWAY ACCESS
9- AT SCHOOL X-ING
10- RR X-ING
11- RECREATIONAL X-ING
20- INTERCHANGE ON RAMP
21- INTERCHANGE OFF RAMP
22- INTERCHANGE ALL OTHERS
90- OTHER*
99- UNKNOWN

WEATHER - WEATHER CONDITION #1 AND #2

- 1- CLEAR
2- CLOUDY
3- RAIN
4- SNOW
5- SLEET/HAIL/FREEZING RAIN
6- FOG/SHOG/SHOGE
7- DRYING SAND/DUST/SHOG
8- SEVERE CROSSWINDS
90- OTHER*
99- UNKNOWN

LIGHT - LIGHTING

- 1- DAY LIGHT
2- BEFORE SUNRISE
3- AFTER SUNSET
4- DARK (STREET LIGHTS ON)
5- DARK (STREET LIGHTS OFF)
6- DARK (NO STREET LIGHTS)
7- DARK (UNKNOWN LIGHTING)
90- OTHER*
99- UNKNOWN

DIAGRAM - VEHICULAR RELATIONSHIPS WHICH LED TO IMPACT

- 1- REAR END
2- SIDESWIPE - SAME DIRECTION
3- LEFT TURN
4- RAN OFF ROAD - LEFT SIDE
5- RIGHT ANGLE
6- RIGHT TURN
7- RAN OFF ROAD - RIGHT SIDE
8- HEAD ON
9- SIDESWIPE - OPPOSING
90- OTHER*
98- NOT APPLICABLE
99- UNKNOWN

SEQUENCE OF EVENTS - PLEASE INDICATE UP TO FOUR CODES THAT REPRESENT THE SEQUENCE OF CRASH-RELATED EVENTS

COLLISION WITH

- 1 - MOTOR VEHICLE IN TRANSPORT
- 2 - PARKED MOTOR VEHICLE
- 3 - ROADWAY EQUIPMENT - SHOWFLOW
- 4 - ROADWAY EQUIPMENT - OTHER
- 5 - TRAIN
- 6 - PEDALCYCLE
- 7 - PEDESTRIAN
- 8 - DEER
- 9 - OTHER ANIMAL

- 10 - UNDERBRIE - REAR
- 11 - UNDERBRIE - SIDE
- 12 - OTHER NON-FIXED OBJECT
- 13 - OTHER COLLISION TYPE
- 14 - UNKNOWN COLLISION TYPE

COLLISION FIXED OBJECT

- 21 - CONSTRUCTION EQUIPMENT
- 22 - TRAFFIC SIGNAL
- 23 - RR CROSSING DEVICE
- 24 - LIGHT POLE
- 25 - UTILITY POLE
- 26 - SIGN STRUCTURE
- 27 - MAILBOXES
- 28 - OTHER POLES
- 29 - HYDRANT

- 30 - TREE/SHRUBBERY
- 31 - BRIDGE PIERS
- 32 - MEDIAN SAFETY BARRIER
- 33 - CRASH CUSHION
- 34 - CHARDRAIL
- 35 - FENCE (NON-MEDIAN BARRIER)
- 36 - CULVERT/HEADWALL
- 37 - EMBANKMENT/DITCH/CURB
- 38 - BUILDING/WALL

- 39 - ROCK OUT CROPS
- 40 - PARKING METER
- 41 - OTHER FIXED OBJECT*
- 42 - UNKNOWN FIXED OBJECT

NON-COLLISION

- 51 - OVERTURN/ROLLOVER
- 52 - SUBMERSION
- 53 - FIRE/EXPLOSION
- 54 - JACKKNIFE
- 55 - LOSS/SPILLAGE NON-HAZ MAT
- 56 - LOSS/SPILLAGE HAZ MAT
- 57 - RAN OFF ROAD - RIGHT
- 58 - RAN OFF ROAD - LEFT
- 59 - EQUIP FAILURE (TIRE, BRAKES)

- 60 - SEPARATION OF UNITS
- 61 - DOWNHILL RUNAWAY
- 62 - CROSS MEDIAN/CENTERLINE
- 63 - CARGO/EQUIPMENT SHIFT
- 64 - NON-COLLISION OF OTHER TYPE*
- 65 - NON-COLLISION OF UNKNOWN TYPE
- 90 - EVENT OF OTHER TYPE*
- 98 - NOT APPLICABLE
- 99 - EVENT OF UNKNOWN TYPE

POSTN - POSITION IN/ON VEHICLE OR LOCATION OF NON-MOTORIST PRIOR TO CRASH**MOTORIST**

- 1 - DRIVER (INCLUDE MOTORCYCLE DRIVER)
- 2 - FRONT CENTER
- 3 - FRONT RIGHT
- 4 - SECOND SEAT LEFT
- 5 - SECOND SEAT CENTER
- 6 - SECOND SEAT RIGHT
- 7 - THIRD SEAT LEFT
- 8 - THIRD SEAT CENTER
- 9 - THIRD SEAT RIGHT
- 10 - OUTSIDE OF VEHICLE
- 11 - TRAILING UNIT
- 12 - PICKUP TRUCK BED
- 13 - TRUCK CAB SLEEPER SECTION
- 14 - PASSENGER IN OTHER POSITION (INCLUDE MOTORCYCLE PASSENGER)
- 15 - PASSENGER IN UNKNOWN POSITION
- 16 - FRONT LEFT (NON-DRIVER)

NON-MOTORIST

- 21 - MARKED CROSSWALK AT INTERSECTION
- 22 - AT INTERSECTION, BUT NO MARKED CROSSWALK
- 23 - NON-INTERSECTION CROSSWALK
- 24 - DRIVEWAY ACCESS CROSSWALK
- 25 - IN ROADWAY
- 26 - NOT IN ROADWAY
- 27 - MEDIAN (BUT NOT ON SHOULDER)
- 28 - ISLAND
- 29 - SHOULDER
- 30 - SIDEWALK
- 31 - WITHIN 10 FT OF ROADWAY (BUT NOT ON MEDIAN, ISLAND, SHOULDER OR SIDEWALK)
- 32 - BEYOND 10 FT OF ROADWAY
- 33 - OUTSIDE TRAFFIC-WAY
- 34 - SHARE-USER PATH OR TRAILS
- 35 - OTHER NON-MOTORIST LOCATION*
- 36 - UNKNOWN NON-MOTORIST LOCATION

SAFETY EQUIPMENT USE

- 1 - BELTS NOT USED
- 2 - LAP BELT ONLY USED
- 3 - SHOULDER BELT ONLY USED
- 4 - LAP AND SHOULDER BELT USED
- 5 - CHILD SEAT NOT USED
- 6 - CHILD SEAT USED IMPROPERLY
- 7 - CHILD SEAT USED PROPERLY

8 - BOOSTER SEAT NOT USED

- 9 - BOOSTER SEAT USED IMPROPERLY
- 10 - BOOSTER SEAT USED PROPERLY
- 11 - HELMET NOT USED
- 12 - HELMET USED
- 13 - DARK (NON-LIGHT-REFLECTIVE CLOTHING)
- 14 - LIGHT REFLECTIVE CLOTHING

15 - NO PROTECTIVE PADS

- 16 - PROTECTIVE PADS
- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

DRIVER LICENSE STATUS

- 1 - VALID - WITH RESTRICTIONS
- 2 - VIOLATION - BEYOND RESTRICTIONS
- 3 - VIOLATION - NOT ENDORSED FOR THIS TYPE VEHICLE
- 4 - VIOLATION - LICENSE SUSPENDED
- 5 - VIOLATION - LICENSE REVOKED
- 6 - VIOLATION - LICENSE CANCELED
- 7 - VIOLATION OF LIMITED LICENSE PROVISIONS
- 8 - VIOLATION - EXPIRED LICENSE
- 9 - VIOLATION - NO LICENSE

90 - OTHER*

- 98 - NOT APPLICABLE
- 99 - UNKNOWN

SAFETY EQUIPMENT TYPE

- 1 - REQUIRED SAFETY EQUIP NOT IN PLACE
- 2 - LAP BELT
- 3 - SHOULDER BELT
- 4 - LAP & SHOULDER BELT
- 5 - CHILD SAFETY SEAT
- 6 - CHILD BOOSTER SEAT

- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

SAFETY - AIR BAG

- 1 - DEPLOYED-FRONT
- 2 - DEPLOYED-SIDE
- 3 - DEPLOYED-FRONT AND SIDE
- 4 - NOT DEPLOYED-SWITCH ON
- 5 - NOT DEPLOYED-SWITCH OFF
- 6 - NOT DEPLOYED-UNKNOWN IF SWITCH ON OR OFF

- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

EJECT - EJECTION FROM VEHICLE

- 1 - TRAPPED, EXTRICATED (BY MECHANICAL MEANS)
- 2 - TRAPPED, FREED BY NON-MECHANICAL MEANS
- 3 - PARTIALLY EJECTED
- 4 - EJECTED
- 5 - NOT EJECTED

- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

INJURY SEVERITY

- K - KILLED
- A - INCAPACITATING INJURY
- B - NON-INCAPACITATING INJURY
- C - POSSIBLE INJURY
- N - NO APPARENT INJURY

DIRECT - PRE-CRASH DIRECTION

- 1 - NORTH
- 2 - NORTHEAST
- 3 - EAST
- 4 - SOUTHEAST
- 5 - SOUTH
- 6 - SOUTHWEST
- 7 - WEST
- 8 - NORTHWEST
- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

TYPE OF ALCOHOL/DRUG TEST GIVEN

- 1 - BLOOD
- 2 - SERUM
- 3 - BREATH
- 4 - URINE
- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

DRIVER LICENSE RESTRICTIONS

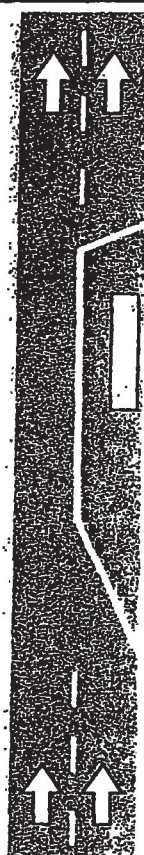
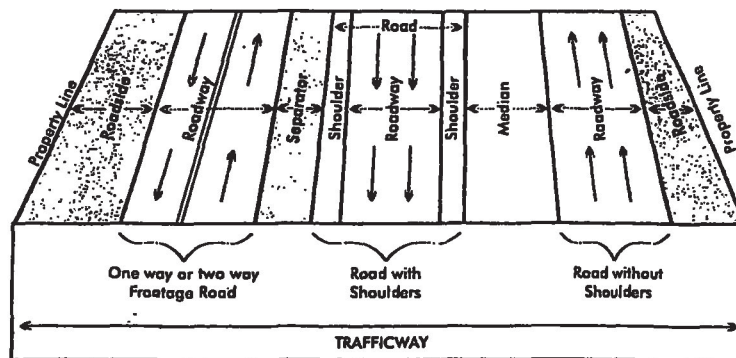
- 1 - NONE
- 2 - CORRECTIVE LENSES
- 3 - MECHANICAL DEVICES
- 4 - PROSTHETIC AID
- 5 - AUTOMATIC TRANSMISSION
- 6 - OUTSIDE MIRROR

7 - LIMIT TO DAYLIGHT HOURS

- 8 - LIMIT TO EMPLOYMENT ONLY
- 9 - LIMITED - OTHER
- 10 - LEARNER'S PERMIT
- 11 - COL - INTRASTATE ONLY
- 12 - VEHICLES W/OUT AIR BRAKES
- 13 - EXCEPT CLASS A BUS
- 14 - EXCEPT CLASS A/CLASS B BUS

15 - EXCEPT TRACTOR/TRAILER

- 16 - FARM WAIVER
- 17 - MULTIPLE RESTRICTIONS
- 90 - OTHER*
- 98 - NOT APPLICABLE
- 99 - UNKNOWN

**DEFINITION OF A WORKZONE****EXAMPLE OF TRAFFICWAY
(FOR REFERENCE WHEN CODING LOCATION)****TRAFFICWAY WITH FRONTAGE ROAD**